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Hospital District, and Quorum Health Resources, LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

ESTATE OF RUSSEL MONACO, BY AND,)
THROUGH KATHY MONACO, WRONGFUL)
DEATH REPRESENTATIVE, AND KATHY)
MONACO, INDIVIDUALLY AND ON)
BEHALF OF MINOR CHILDREN,)

Plaintiff,)

vs.)

13 CV 151S

HARLEY G. MORRELL, PA-C, JOHN)
SCHNEIDER, JR., M.D., NORTHERN ROCKIES)
NEURO-SPINE, P.C. a Wyoming Corporation)
WEST PARK HOSPITAL DISTRICT, WEST)
PARK HOSPITAL, QUORUM HEALTH)
RESOURCES, LLC, a Delaware Corporation)
AND JOHN DOES 1 THROUGH 10,)

Defendants.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER FIRST AMENDED COMPLAINT**

COME NOW Defendants West Park Hospital, West Park Hospital District and Quorum Health Resources, LLC, by and through their attorneys, Lathrop & Rutledge, P.C., and move the Court, pursuant to F.R.C.P. 6(b)(1)(A), for an order extending Defendants deadline to Answer or

otherwise defend Plaintiff's First Amended Complaint and Jury Demand filed on December 16, 2013. In support of this Motion, the undersigned represents to the Court as follows:

1. Counsel has calculated the current due date of an Answer or other responsive pleadings to be December 30, 2013;
2. Counsel has conferred with Counsel for Plaintiff, Jon M. Moyers, and Mr. Moyers does not oppose an extension of time to Answer or defend for ten (10) days or until January 9, 2014;
3. Counsel believes a ten (10) day extension is a reasonable request which will not unnecessarily delay the proceedings in this matter and notes the Christmas holidays have hampered our ability to answer in a timely fashion.

WHEREFORE, Defendant prays the Court enter an Order granting Defendants West Park Hospital, West Park Hospital District (both of which are the same party) and Quorum Health Resources, LLC, an extension until January 9, 2014, to Answer or otherwise defend Plaintiff's First Amended Complaint and Jury Demand of December 16, 2013.

Dated this 26th day of December, 2013.

/s/ Ericka S. Smith
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing was served via U.S. mail and that on the 26th day of December, 2013 the foregoing was filed with the Court using the CM/ECF system and electronic notice served to the following:

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/s/ Ericka S. Smith